

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants,

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**PLAINTIFF’S MOTION FOR CONTEMPT AND SANCTIONS AGAINST
EDWARD AND DAWN BRONSON AND FOR TURNOVER**

Plaintiff Securities and Exchange Commission (“Plaintiff” or the “SEC”) respectfully requests that this Court issue an Order to Show Cause why Edward and Dawn Bronson (“Bronson”) should not be held in civil contempt for their violations of the Court’s Judgment, Payment Plan Order and Liquidation Orders, DEs 193, 272, 278. The SEC also moves for a turnover order requiring certain funds held by Edward Bronson’s attorney, Judd Burstein, and the proceeds of the sale of the Bronsons’ Escalade to be turned over to the SEC. In support of this motion, the SEC submits the February 2, 2023 Declaration of Maureen Peyton King and attachments thereto and Plaintiff’s memorandum of law.

For the reasons set forth in the supporting documents, the SEC respectfully requests that the Court grant Plaintiff's motion and enter the proposed Order to Show Cause and the proposed Turnover Order.

Dated: Wantagh, New York
February 2, 2023

s/ Maureen Peyton King
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